

Hazardous Waste Connection

Compliance Information for Generators in Kansas

Fall/Winter 1999

Vol. 3, No. 3

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Small Quantity Generators and the Kansas Household Hazardous Waste Program An Alternative for Disposal

By Betsy Sabel-Livingston and Nancy Larson

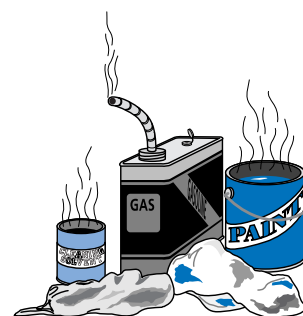
Did you know that small quantity generators in Johnson and Sedgwick Counties can use the Household Hazardous Waste (HHW) program to dispose of their hazardous wastes? It seems many small quantity generators are unaware of this program designed to assist them with waste disposal.

The Johnson County Environmental Department has operated a HHW collection program since 1993. In 1996, the Department expanded its HHW services to include businesses, institutions, schools and government agencies by offering to all Small Quantity Generators in Johnson County an alternate and safe method of disposal of their hazardous wastes. This voluntary program is fee- based and operates at the Johnson County Hazardous Materials Collection Facility. Under current regulations, Small Quantity Generator (SQG) waste must be disposed of in an environmentally safe manner. This can include disposal in a municipal solid waste landfill with other trash or in the sanitary sewer. Although legal, these types of disposal methods can pose hazards to the environment, trash collection and landfill staff, wastewater collection systems, and treatment plants and their staff.

Since the program's inception in 1996, more than 120 businesses/institutions have participated. The program has collected more than 4300 gallons of flammable liquids and more than 6300 pounds of various other materials. These materials have either been recycled, reused or disposed of as hazardous waste. Flammable liquids, for example, are used as fuel blend for cement kilns. In addition to hazardous waste, the program accepts latex paint and has collected more than 2800 gallons from businesses. Since 1993, more than 40,000 gallons of latex paint from both businesses and households have been re-blended and distributed back into the community.

To participate in this program, a SQG business or institution must submit an application form to the Johnson County Environmental Department. Upon review, the Department will issue to the business/institution an authorization letter. Wastes are accepted at the facility by appointment only and the facility is only open for generators of SQG waste in Johnson County. For the current fee schedule and information about the program, call Betsy Sabel-Livingston at the Johnson County Environmental Department at 913-492-0402.

The Sedgwick County's HHW program began in 1991 and added the SQG waste collection service in 1997. Sedgwick County's SQG program is administered through the local health department. The department offers the following services to businesses: pro-rated hazardous waste disposal for pre-qualified SQGs, pollution prevention evaluations, RCRA compliance assistance, and material/waste exchange. This voluntary, non-regulatory program has worked with about 180 businesses over the past two years and diverted about 30,000 pounds of waste during 1999 (disposal of hazardous waste, in any quantity, is prohibited at Sedgwick County's Brooks Landfill). On-site registration is required prior to disposal. For more information, please call 316-268-8351.



Hazardous Waste Connection



Kansas Department of Health &
Environment

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By Bill Bider

Prior to preparing this issue of *Hazardous Waste Connection*, we internally reviewed our original goals and expectations for the newsletter. We established *Hazardous Waste Connection* in 1997 to improve compliance with the rules that apply to hazardous waste generators. Our primary target audience is the small and medium-sized businesses and other generators which may not have the resources to hire full-time environmental compliance managers; however, we believe larger generators can also benefit from the information presented. We strive to provide helpful compliance information in a format which is easy to understand and practical.

The outcomes of improved generator compliance are many including: (1) fewer environmental releases, (2) less worker exposure to hazardous constituents, (3) a more knowledgeable workforce, and (4) minimized generator liabilities with respect to the costs of waste disposal, corrective action to clean up releases, and potential fines associated with non-compliance. Through *Hazardous Waste Connection*, we also seek to make compliance as “painless and efficient” as possible for generators. In other words, we try to present information which explains how generators can comply without significantly impacting production and operational activities, and without needing expensive consulting help.

So....is *Hazardous Waste Connection* accomplishing these goals? Has the information provided in our first nine issues been helpful? Are there some ways we can improve or are there areas which you would like to see addressed? We have heard from many people that the newsletter has helped them, but we would really like to hear from more readers. Please take a few minutes to call, send us a note, or an e-mail message to let us know what you think. We would greatly appreciate and value your comments. Thanks in advance for helping us make this newsletter more valuable to you and other readers.

FOCUS ON... Commonly Asked Used Oil Questions



Help! I repair refrigeration compressor units. What do I do if my used oil contains CFCs?

If your business repairs air conditioners and refrigeration units, you probably generate used oil containing chlorofluorocarbons (CFCs) or hydrochlorofluorocarbons (HCFCs). Compressor oils containing CFCs will not pass the “sniffer test” because they contain more than 1,000 parts per million (ppm) of total halogens. Even after the CFCs have been recovered from the used oil, the reclaimed used oil may still contain significant quantities of CFCs. As long as the CFC-contaminated used oil is kept in a separate container and NOT mixed with other used oil or other wastes, it will not be considered hazardous waste.

Used oil containing CFCs being sent for recycling may not meet the DOT definition of a hazardous material so it may not be subject to DOT regulations. Used oil must be handled as a hazardous material if it is a “combustible liquid” (has a flashpoint between 141° and 200°F) or a “flammable liquid” (has a flashpoint of less than 141°F). Otherwise, the CFC-contaminated used oil could be shipped as off-spec used oil, a non-RCRA waste liquid, and no RCRA waste codes would be applicable. Generally, CFC-contaminated used oil is shipped in drums. Used oil reclaimers should not mix CFC-contaminated used oil with other used oil in their used oil tanker.

CFC-contaminated used oil should be sent for reclamation or burned for energy content at a permitted hazardous waste combustion facility. It is not a good idea for the generator to burn CFC-contaminated used oil in their used oil space heater because of the potential to create air pollutants.

If my used oil doesn't pass the “sniffer test”, then what?

If your used oil doesn't pass the “sniffer test” it can mean that hazardous wastes have been added. Transporters will generally check the used oil with a halogen leak detector or sniffer (similar to what's used to check for freon leaks) to determine if halogens are present. If the sniffer senses halogens, the transporter should follow up to see if the total halogen concentration is above 1,000 parts per million (ppm). This can be done by either field testing or taking a sample for laboratory analyses. Normally used oil contains less than 1,000 ppm of total halogens so a higher number can indicate that hazardous wastes were added to the used oil. There are some types of virgin oil that may normally have total halogen levels above 1,000 ppm. Certain metalworking oils or cutting fluids have chlorinated additives (paraffins) in the virgin oil causing the used oil to fail the “sniffer test”. In this case, the generator can rebut the presumption that hazardous waste has been added to the used oil.

(Continued on Page 3)

Hazardous Waste Generators' Top Violations in 1999

Listed in the table below are the top three major violation categories cited from Kansas and EPA Generator facilities inspected during 1999. Many facilities we talk to express their commitment to compliance with the hazardous waste regulations. A quick check at your facility in these areas may assist your facility in maintaining compliance with the regulations.

Kansas & EPA Generators	
Primary Major Violation Type - Improper Handling of Hazardous Waste Storage Containers <ul style="list-style-type: none">▶ Container not labeled “hazardous waste”▶ Container not marked with start date (date the waste was first placed in the container)▶ Container not completely closed▶ Weekly inspections of containers either not done or not (properly) documented	
Kansas Generator Second Major Violation Type - General Generator Requirements <ul style="list-style-type: none">▶ Failure to determine if waste stream is hazardous▶ Failure to update Notification Form Third Major Violation Type - Emergency Preparedness Requirements <ul style="list-style-type: none">▶ Failure to post emergency information next to (at least one) telephone▶ Failure to provide training to employees▶ Failure to list 1 employee as emergency coordinator/contact	EPA Generator Second Major Violation Type - Contingency Plan Requirements <ul style="list-style-type: none">▶ Failure to update plan’s emergency coordinator(s)▶ Failure to describe emergency equipment, location, capabilities▶ Failure to describe alternate emergency evacuation routes in plan Third Major Violation Type - Personnel Training Requirements <ul style="list-style-type: none">▶ Failure to conduct/document initial & annual training▶ Failure to describe amount & type of training▶ Failure to maintain training records

(Used Oil Questions Continued from Page 2)

One way is to check the Material Safety Data Sheets (MSDSs) for this information. Another method is to send a sample to a laboratory for analysis.

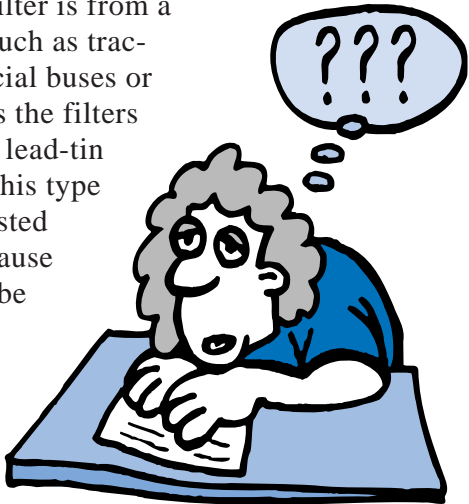
If the total halogens are between 1,000 and 4,000 ppm, the used oil can be disposed of as off-spec used oil. Any used oil with total halogen concentration above 4,000 ppm will need to be managed and disposed of as hazardous waste.

How do I handle used oil filters?

All free flowing used oil should be removed from the filter before it is disposed. The best method for removal is the “hot drain” method, letting the filter drain for at least 12 hours at near engine operating temperatures. The used oil can also be removed by using a mechanical pressure device. Oil filters used on light duty vehicles such as cars and pickup trucks are made from a metal alloy called non-terne because it does not contain lead. Testing of this material found it to be non-hazardous, so when all the free flowing used

oil is drained, the filter can be disposed of as solid waste. When possible, the preferred disposal method is to send the drained or crushed filter to a scrap metal recycler.

If the used oil filter is from a heavy duty vehicle such as tractor-trailers, commercial buses or construction vehicles the filters may be made from a lead-tin alloy called terne. This type of filter should be tested prior to disposal because it has been found to be hazardous for lead. Used terne oil filters may need to be disposed of as hazardous waste.



264-21

ADDRESS CORRECTION REQUESTED



Upcoming Events

March 21 - 23, 2000

Recycling & Composting Works! Conference, Bethany College, Lindsborg, Kansas
Sixth Annual Workshop and Conference covering Composting, Recycling, wood waste utilization, and source reduction. Call 785/291-3510 for more information.

May 3 - 4, 2000

Kansas Radiation Control Workshop 200, Ramada Inn, Topeka, Kansas
Workshop covering safe and proper use of radioactive materials and radiation producing devices. Call 785/296-1560 for more information or our Web Page @ www.kdhe.state.us.ks

May 18, 2000

SBEAP Industrial Cleaning Show, Bicentennial Center, Salina, Kansas
See the latest on industrial cleaners, non-hazardous solvent substitutes. Call 800/578-8898 for more information or the internet at ppi@ksu.edu

☎ Important Hazardous Waste (HW) Program Phone Numbers

Kansas Department of Health & Environment (KDHE)

Clyde D. Graeber, Secretary 785/296-0461
KDHE - Division of Environment
Ronald Hammerschmidt, PhD, Director 785/296-1535
KDHE - Bureau of Waste Management 785/296-1600
Bill Bider, Director 785/296-1612
a. Mary Bitney, Technical Support Section Chief . 785/296-1603
b. John Mitchell, W. P. P. & O. Section Chief 785/296-1608
c. Dennis Degner, PhD, Permitting Section Chief . 785/296-1601
Mostafa Kamal 785/296-1609
Ron Smith 785/296-1604
David Branscum 785/296-6898
George McCaskill 785/296-1606
Linda Prockish 785/296-0005
Mark Duncan 785/296-1614
Lynda Ramsey 785/296-0681
KDHE - District Office Inspectors
Northeast - Lawrence 785/842-4600
Southeast - Chanute 316/431-2390
North Central - Salina 785/827-9639
South Central - Wichita 316/337-6020
Northwest - Hays 785/625-5663
Southwest - Dodge City 316/225-0596
EPA RCRA Hotline (800) 424-9346

KDHE Public Advocate 785/296-0669
toll free for long distance (800) 357-6087

Kansas State University (KSU)

Pollution Prevention Institute/Small Business
Environmental Assistance Program (SBEAP) 785/532-6501
SBEAP - Hot Line (800) 578-8898

University of Kansas (KU)

SBEAP - Resource Library 785/864-3968

BWM Fax 785/296-8642
email shawks@kdhe.state.ks.us

HOW MAY WE DIRECT YOUR CALL....

EPA ID numbers David Branscum
Compliance Assistance Outreach Program Mary Bitney
General HW Generator questions Ron Smith
Groundwater Monitoring Mark Duncan
HW Complaints Lynda Ramsey or Ron Smith
HW Notification questions David Branscum
HW Permits Mostafa Kamal
HW Regulation information .. John Mitchell or George McCaskill
HW Transporter Registration information Linda Prockish
PCB, TSCA and/or CERCLA George McCaskill
Newsletter Contact Mary Bitney